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April 28, 2021

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square, Courtroom 1305
New York, New York 10007

Re: *United States v. William Sadleir*, No. 20 Cr. 320 (PAE)

Dear Judge Engelmayer:

I represent the defendant, and write with the consent of the government to respectfully request a two-week adjournment of the motion schedule in this case. Good cause exists to extend the briefing schedule to allow the parties to continue to discuss whether they may be able to moot, in whole or in part, the need for motion practice – or to reach a disposition of this case in its entirety.¹

Under the current schedule, the defendant's motions are due this Friday, April 30. (ECF No. 23). The defendant respectfully requests that the Court adopt the following briefing schedule, which adjourns each of the dates in the existing briefing schedule by two weeks:

The defense's pretrial motions shall be filed by May 14, 2021

The government's response shall be filed by June 4, 2021

Any replies shall be filed by June 18, 2021.

No other deadlines would be affected by this request, nor would the next hearing date (June 24, 2021 at 2:30 PM) or the trial date (January 24, 2022). This is the defendant's first request for an adjournment of the briefing schedule. As noted, the government consents to this request.

Thank you for your consideration.

Respectfully,

/s/ Matthew L. Schwartz
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New York, New York 10001

¹ In addition, I am scheduled to receive my second COVID vaccine shot tomorrow morning, and anticipate I may be unable to devote my full attention to finalizing motions papers currently due the following day.